

BEARING DATE AND TIME: March 1, 2011 at 9:45 a.m. (Eastern Time)
RESPONSE DEADLINE: February 22, 2011 at 4:00 p.m. (Eastern Time)

On the Behalf of Mrs. Doris E. McConnick
964 Contadero Pl.
Las Vegas, Nevada 53097
Telephone: (702) 454-3210

By: John K. McConnick, POA
6781 Glacier Drive
West Bend, Wisconsin 53090
Telephone: (262) 629-5100
Email: jmconnick51.00
@charter.net

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*

Debtors.

Chapter II Case No.

09-50026 (REG)

(Jointly Administered)

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OBJECTION TO DEBTORS' 187th OMNIBUS OBJECTION TO CLAIMS
(Qualified Defined Benefits Pension Benefits Claims of Former Salaried and Hourly Employees)

THIS OBJECTION SEEKS TO DISALLOW THE DEBTORS' 187TH OMNIBUS OBJECTION TO CLAIM 4030.

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Mrs. Doris E. McConnick as claimant, respectfully

represent:

RELIEF REQUESTED

1. The claimant requests this Court's order denying the Debtors' 187th OMNIBUS OBJECTION TO CLAIMS, seeking an order disallowing and expunging certain Qualified Defined Benefits Pension Benefits claims of former salaried employees.

Background

2. The Debtors' first offered Early Retirement in the 1970's. As an inducement to retire early, the Debtors' offered full pension benefits and full medical coverage for life for those electing early retirement. Mr. Eugene D. McCormick, a salaried employee of the Debtors' accepted that agreement and retired early. The agreement covered his spouse and any dependants. The inducement of the full medical coverage for life has never been offered since then and the Debtors' have tried three times since that that offering to terminate or reduce the full medical coverage agreement. Each time, the Debtors' have lost in court. That medical coverage would include any costs, including any asbestos related medical coverage. As future medical costs are unpredictable, the Debtors' choose to list the costs as unliquidated and/or unidentified with a value of \$0.00. Claimant would argue that the original contractual agreement for future medical coverage could be determined by actuarial tables such as those provided in the "NOTICE OF HEARINGS ON MOTION FOR ENTRY OF AN ORDER ESTABLISHING CLAIMS RESERVES IN CONNECTION WITH DISTRIBUTIONS TO BE MADE UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN WITH RESPECT TO , AMONG OTHER THINGS, CERTAIN UNLIQUIDATED CLAIMS", filed by the firm WEIL, GOTSHAL & MANGES, LLP.

Relief Requested Should Be Allowed by the Court

3. It is believed that the denial of the Debtors' 187th OMNIBUS OBJECTION TO CLAIMS as it regards Mrs. Doris E. McCormick's file #4030 should be denied due to the reliance on the original contract for Early Retirement with the inducement of full medical coverage for life.

Notice

4. Notice of this Objection has been provided on February 15th, 2011 as follows:

By Electronic Mail
Harvey R. Miller
harvey.miller@weil.com
Stephen Karotkin
stephen.karotkin@weil.com
Joseph H. Smolinsky
Joseph.smolinsky@weil.com
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
767 Fifth Avenue
New York, NY 10153
Counsel for the Debtors

By Electronic Mail
James L. Bromley
jbromley@cgsh.com
Cleary Gottlieb Steen & Hamilton LLP One
Liberty Plaza
New York, NY 10006
Counsel for UA W

By Electronic Mail
Michael J. Edelman
mjedelman@vedderprice.com
Michael L. Schein
mschein@vedderprice.com
Vedder Price, PC
1633 Broadway, 47th Floor
New York, NY 10019
Counsel for Export Development Canada

By Electronic Mail
David S. Jones
david.jones@usdoj.gov
Matthew L. Schwartz
matthew.schwartz@usdoj.gov United
States Attorney's Office Southern
District of New York 86 Chambers
Street, Third Floor New York, NY
10007
Facsimile: (212) 637-2684

By Electronic Mail
Adam C. Rogoff
aragofi@kramerlevin.com
Robert T. Schmidt
rschmidt@kramerlevin.com
Amy Caton
acaton@kramerlevin.com
Kramer Levin Naftalis & Frankel LLP 1177
Avenue of the Americas
New York, NY 10036
Counsel for Official Committee of
Unsecured Creditors

By Electronic Mail John
I. Rapisardi
john.rapisardi@cwt.com
Cadwalader, Wickersham & Taft LLP One
World Financial Center
New York, NY 10281
Counsel for
Vehicle Acquisition Holdings LLC

By Facsimile
Diana G. Adams
Office of the United States Trustee for the
Southern District of New York
33 Whitehall Street, 21st Floor
New York, NY 10004
Facsimile: (212) 668-2255

By Electronic Mail
Brian Masumoto
brian.masumoto@usdoj.gov
Tracy Davis
tracy.davis@usdoj.gov
Office of the United States Trustee for the
Southern District of New York
33 Whitehall Street, 21st Floor
New York, NY 10004
Facsimile: (212) 668-2255

By Electronic Mail
Matthew Feldman
matthew.feldman@do.treas.gov
1500 Pennsylvania Avenue, NW
Room 2312
Washington, DC 20220
United States Treasury

By Electronic Mail
Lawrence S. Buonomo
lawrence.s.buonomo@gm.com
Motors Liquidation Company
300 Renaissance Center
Detroit, MI 48265

By Electronic Mail
Ted Stenger
tstenger@alixpartems.com
Motors Liquidation Company
300 Renaissance Center
Detroit, MI 48265

Isl John K McCormick

I P Legal Center & McCormick Law Offices

6781 Glacier Drive

West Bend, WI 53090
Telephone: (262) 629-5100